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May 29, 2020

***Via ECF & E-mail***

The Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007  
(Email: [EngelmayerNYSDChambers@nysd.uscourts.gov](mailto:EngelmayerNYSDChambers@nysd.uscourts.gov))

Re: *United States v. Edwin Leon*, 15 Cr. 877 (PAE)

Dear Judge Engelmayer:

We represent Edwin Leon in the above-referenced matter. We write pursuant to the Court's May 26, 2020 Order directing counsel to file a letter addressing whether Mr. Leon is entitled to compassionate release.

The undersigned have been working with Mr. Leon and his family since early April in an attempt to secure his compassionate release from incarceration. To that end, on April 9, 2020, we submitted a letter to the warden at Fort Dix FCI requesting that he be granted compassionate release. By letter dated April 27, 2020, the warden at Fort Dix denied release to home confinement but noted that our request for compassionate release would be considered separately. We have not yet received a response with respect to that application. Since that date we have been working with his family in an attempt to obtain medical records to support a compassionate release motion to the Court now that exhaustion has been achieved.

Following the Court's May 26, 2020 Order, we conferred with the government and they are assisting us in obtaining Mr. Leon's medical records from the Bureau of Prisons. Our understanding is that they have not yet received the records.

Accordingly, we respectfully request that the Court extend the date for the defense to file a motion seeking Mr. Leon's compassionate release until a time when we have received and reviewed Mr. Leon's BOP medical history and the date on which the government is to respond be appropriately extended. We apologize for any inconvenience and thank the Court for its consideration.

Respectfully submitted,

/s/

César de Castro  
Valerie A. Gotlib

cc: all counsel of record (*via* ECF)